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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR-PHK

**JOINT STATUS REPORT ON THE  
TIKTOK DEFENDANTS' 30(B)(6)  
WITNESS SAMANTHA KERSUL  
SEARCH TERMS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

This Document Relates to:

ALL ACTIONS

Pursuant to the Court's Order resolving Plaintiffs' motion compel the TikTok Defendants to produce the custodial file of Rule 30(b)(6) witness Samantha Kersul (Dkt. 2327), Plaintiffs and the TikTok Defendants (collectively, "the Parties") jointly submit this report on the status of the Parties' negotiations concerning a reasonable subset of search terms.

Consistent with the Court's instruction, the Parties met and conferred via videoconference on October 27 and again on October 30, 2025, to discuss a proposed set of search terms, which Plaintiffs proposed on October 23 and to which the TikTok Defendants responded on October 29. Plaintiffs sent a further revised set of search terms on October 30. The Parties have made substantial progress and expect to continue to meet and confer to finalize the subset of search terms consistent with the Court's Order.

Dated: October 31, 2025

Respectfully submitted,

/s/ Felicia Craick

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Felicia Craick, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 31st day of October, 2025, at Seattle, Washington.

/s/ Felicia Craick

Felicia Craick



**CERTIFICATE OF SERVICE**

I, Sarah Skaggs, hereby certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Sarah Skaggs

Sarah Skaggs